

THOMAS F. PITARO, ESQ.
NEVADA BAR NO.: 1332
PITARO & FUMO, CHTD.
601 Las Vegas Boulevard, South
Las Vegas, NV 89101
Telephone: (702) 382-9221 Facsimile: (702) 382-9961
[Email](mailto:kristine.fumolaw@gmail.com): kristine.fumolaw@gmail.com/ pitaro@gmail.com
Attorney for Defendant JUAN LUIS SOSA TAMAYO

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, : Case No. 2:20-cr-00194-JAD-DJA

Plaintiff,

v.

JUAN LUIS SOSA TAMAYO et. al,

Defendants.

**STIPULATION TO CONTINUE
SENTENCING**

1st Request

IT IS HEREBY STIPULATED AND AGREED, by and between Eric C. Schmale, Assistant United States Attorney, counsel for the United States (hereinafter “the Government”), and Thomas F. Pitaro, counsel for defendant Juan Sosa Tamayo (collectively, “the Parties”), that the sentencing scheduled for December 13, 2022, at 10:00 a.m., be vacated to a date and time convenient to the court, but not earlier than 60 days.

The Stipulation is entered into for the following reasons:

1. The additional time requested herein is not sought for purposes of delay.
2. Counsel Thomas Pitaro, attorney for Juan Sosa Tamayo, needs additional time to prepare for sentencing.

1 3. Counsel Thomas Pitaro, attorney for Juan Sosa Tamayo, has a medical procedure
2 and needs additional time to recover.

3 4. Counsel has spoken to Defendant and he has no opposition to the continuance.

4 5. Counsel has spoken to the Government and he has no opposition to the
5 continuance.
6

7 6. The parties agree to the continuance.

8 7. The additional time requested herein is not sought for purposes of delay, but
9 merely to allow counsel for defendants sufficient time within which to be able to effectively
10 prepare for sentencing, taking into account the exercise of due diligence.
11

12 8. Denial of this request for continuance would deny counsel for sufficient time to
13 effectively represent the defendant.

14 This is the first Stipulation to continue the sentencing and related dates in this matter.
15

16 DATED: This 23rd day of November, 2022.

17 PITARO & FUMO, CHTD.
18

JASON M FRIERSON
UNITED STATES ATTORNEY

19 By /s/ Thomas Pitaro
20 THOMAS F. PITARO
21 Counsel for Defendant Juan Sosa Tamayo

By /s/ Eric Schmale
Eric C. Schmale
Assistant United States Attorney

UNITED STATES OF AMERICA,	:	Case No. Case No. 2:20-cr-00194-JAD
	:	
Plaintiff,	:	
	:	
v.	:	ORDER
JUAN LUIS SOSA TAMAYO et. al,	:	
	:	
Defendants.	:	
	:	

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

- 3

8. Denial of this request for continuance would deny counsel for sufficient time to effectively represent the defendant.

This is the first Stipulation to continue the sentencing and related dates in this matter.

ORDER

IT IS THEREFORE ORDERED that the sentencing currently set for December 13, 2022 at 10:00 a.m., is vacated and continued to February 27, 2023, at 3:00 p.m.

DATED this 23rd day of November, 2022.

UNITED STATES DISTRICT JUDGE